

# EXHIBIT 24

Bryson, Santana and Joshua v. Rough Country, LLC

Page 1

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA )  
BRYSON, as Administrators of )  
the Estate of C.Z.B., and )  
as surviving parents of )  
C.Z.B., a deceased minor, )

Plaintiffs, )

vs. )

ROUGH COUNTRY, LLC, )

Defendant. )

CIVIL ACTION FILE

NO. 2:22-cv-17-RWS

VIDEOTAPED DEPOSITION OF  
WESLEY D. GRIMES  
May 9, 2024  
10:17 a.m.

Weinberg Wheeler Hudgins Gunn & Dial  
3344 Peachtree Road, NE  
Suite 2400

Atlanta, Georgia

Reported by: Marsi Koehl, CCR-B-2424

1 kit was installed on Mr. Elliott's vehicle?

2 A. I don't. I know Mark went up online and  
3 tried to get some information of what the lift kits  
4 contained and we put that in our report as we  
5 understand it. But I'm not looking at a specific  
6 model or serial number or anything like that.

7 Q. Do you have any reason to disagree that  
8 Rough Country sold this lift kit as a 4.5 inch lift  
9 kit?

10 A. I have no information. I have no opinion  
11 about that.

12 Q. Do you agree the lift kit was installed  
13 properly?

14 A. I have no idea. I don't do lift kit  
15 installation analysis.

16 Q. Is it your opinion -- strike that.

17 So I understand your answer to be that  
18 you're not saying it was installed improperly, you're  
19 not saying it was installed properly, you just don't  
20 have an opinion either way; is that fair?

21 A. That's fair, yeah. I know the vehicle had a  
22 lift kit.

23 Q. Did you form an opinion about how much the  
24 Rough Country lift kit raised the front bumper of the  
25 subject F-250?

1           A. I didn't look at that specifically. I've  
2           seen in Mr. Buchner's materials -- I think he said  
3           like 5 and-a-half or 6 inches. I don't dispute that  
4           it's certainly in that range, but I haven't measured  
5           that specifically.

6           Q. So you don't have any disagreement with  
7           Mr. Buchner's analysis of how much the Rough Country  
8           lift kit raised the front bumper of Mr. Elliott's  
9           F-250?

10          A. Well, I didn't look at the front bumper. I  
11          looked at the frame rails. And it looks like, again,  
12          it's about five to six inches, something like that.  
13          Closer to six than to five, but I'm looking at the  
14          bottom of the frame rail.

15          Q. You don't have any criticism of Mr.  
16          Buchner's analysis on the amount of practical lift on  
17          the front of the F-250?

18          A. I haven't looked at it specifically but as I  
19          sit here, no.

20          Q. So you have no reason to disagree with his  
21          conclusion about how much the lift raised the front  
22          frame rail of the F-250?

23          A. As I sit here, no.

24          Q. Ms. Grimes performed a 3D scan of an  
25          exemplar Escape on December 20th of 2022, right?

1 Q. And then same question laterally, is  
2 negative --

3 A. Negative means --

4 Q. -- left or --

5 A. Negative would mean to the left.

6 Q. Meaning that the force is going from right  
7 to left; is that correct?

8 A. That's my recollection. I was reading  
9 through the airbag module data here to see if it says  
10 and I don't see it offhand.

11 Q. But your --

12 A. But in general negative would be right to  
13 left.

14 Q. And you reported -- I think you were getting  
15 to this a moment ago. You reported the delta-v for  
16 the subject collision at the time of 141 milliseconds  
17 after times zero, right?

18 A. Can you ask that again, please?

19 Q. Yeah. And if there's something wrong with  
20 the wording, please let me know.

21 You conclude -- scratch that.

22 You reported the delta-v for the subject  
23 collision at the time of 141 milliseconds after times  
24 zero; is that right?

25 A. Yes.